

## **Exhibit 23**

NEW YORK  
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SINGAPORE  
PHILADELPHIA  
CHICAGO  
WASHINGTON, DC  
SAN FRANCISCO  
SILICON VALLEY  
SAN DIEGO  
LOS ANGELES  
TAIWAN  
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AUSTIN  
HANOI  
HO CHI MINH CITY

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SHANGHAI  
ATLANTA  
BALTIMORE  
WILMINGTON  
MIAMI  
BOCA RATON  
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NEWARK  
LAS VEGAS  
CHERRY HILL  
LAKE TAHOE  
MYANMAR  
OMAN  
A GCC REPRESENTATIVE OFFICE  
OF DUANE MORRIS  
ALLIANCES IN MEXICO  
AND SRI LANKA

October 22, 2019

VIA EMAIL

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Re: **In re Valsartan Products Liability Litigation**, Civ. No. 19-md-2875 (D.N.J.)

Counsel:

Pursuant to the Court's Order entered on October 21, 2019 (ECF 274) in the above-referenced matter, Zhejiang Huahai Pharmaceutical Co. ("ZHP") is producing organizational charts for its Regulatory Affairs, API Production, API Quality Assurance, and API Quality Research departments, Bates stamped ZHP00000001–ZHP00000005. In addition, Princeton Pharmaceutical Inc. is producing an organizational chart showing the corporate relationship

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October 22, 2019  
Page 2

between the Princeton Defendants, Bates stamped PRINSTON00079003. We hope to supplement this production with additional organizational charts at tomorrow's meeting. In serving this production, ZHP expressly reserves all objections to discoverability and admissibility, as well as all defenses, jurisdictional or otherwise.

In addition, set forth below are the custodians ZHP has proposed in its original letter dated September 23, 2019 and during the meet-and-confer sessions on October 7 and October 16.

**Proposed on September 23, 2019:**

1. LIN, Lihong (Linda) – Director of ZHP's Regulatory Affairs department
2. WANG, Peng – Senior Director of ZHP's API Manufacturing department
3. DONG, Peng – Director of ZHP's Technical department
4. GE Jucai – Director of ZHP's API Division Quality Assurance department
5. LI Qiangming – Director of ZHP's API Quality Control department
6. LI Min – Vice President of ZHP's Analytical Operations department
7. Wang Jie – Vice President of ZHP's Business Development department

**Proposed on October 7:**

8. LIU, Yanfeng (Lucy) – Deputy Director/Manager in ZHP's Regulatory Affairs department
9. ZHOU, Ting (Ada) – Assistant Director in ZHP's Regulatory Affairs department
10. HU, Yuelin – Assistant Director in ZHP's API Division Quality Assurance department

**Proposed on October 16:**

11. XIONG, Ying – Supervisor in ZHP's Regulatory Affairs department
12. LIU, Xiamong – Head of Technical department for finished dose
13. CHENG, Wei – Employee in ZHP's API Quality Assurance department
14. ZHU, Wenquan – Director of ZHP's API Quality Research department

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October 22, 2019  
Page 3

15. ZHANG, Minli – Director of ZHP’s Finished Dose Quality Assurance & Finished Dose Quality Control departments
16. XU, Weiwei – Employee in ZHP’s Purchasing department
17. XU, Min – Employee in ZHP’s Purchasing department
18. HU, Min – Employee in ZHP’s Purchasing department
19. ZHENG, Gaozhe – Employee in ZHP’s Purchasing department
20. CAI, Minda – Former Vice President of ZHP’s API Sales department
21. XU, Mi – Senior Director in ZHP’s Business Development department
22. ZHONG, Sheng – Director in ZHP’S Business Development department
23. LI, Hungchao – Manager in ZHP’s Business Development department

In advance of tomorrow’s meeting, we can confirm that Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC do not maintain organizational charts in the ordinary course of business. Princeton and Solco propose the following custodians. As we have previously discussed, Huahai U.S. has not sold valsartan API for commercial purposes in the United States.

**Princeton Pharmaceutical Inc.**

1. Xiaodi Guo, Senior Vice President of Research & Development
2. Remonda Gergis, Vice President of Quality Assurance
3. Lijie Wang, Vice President of Regulatory Affairs

**Solco Healthcare U.S., LLC**

1. Hai Wang, President
2. Chris Keith, Senior Vice President of Marketing & Business Development

Sincerely,

*/s/ Seth A. Goldberg*

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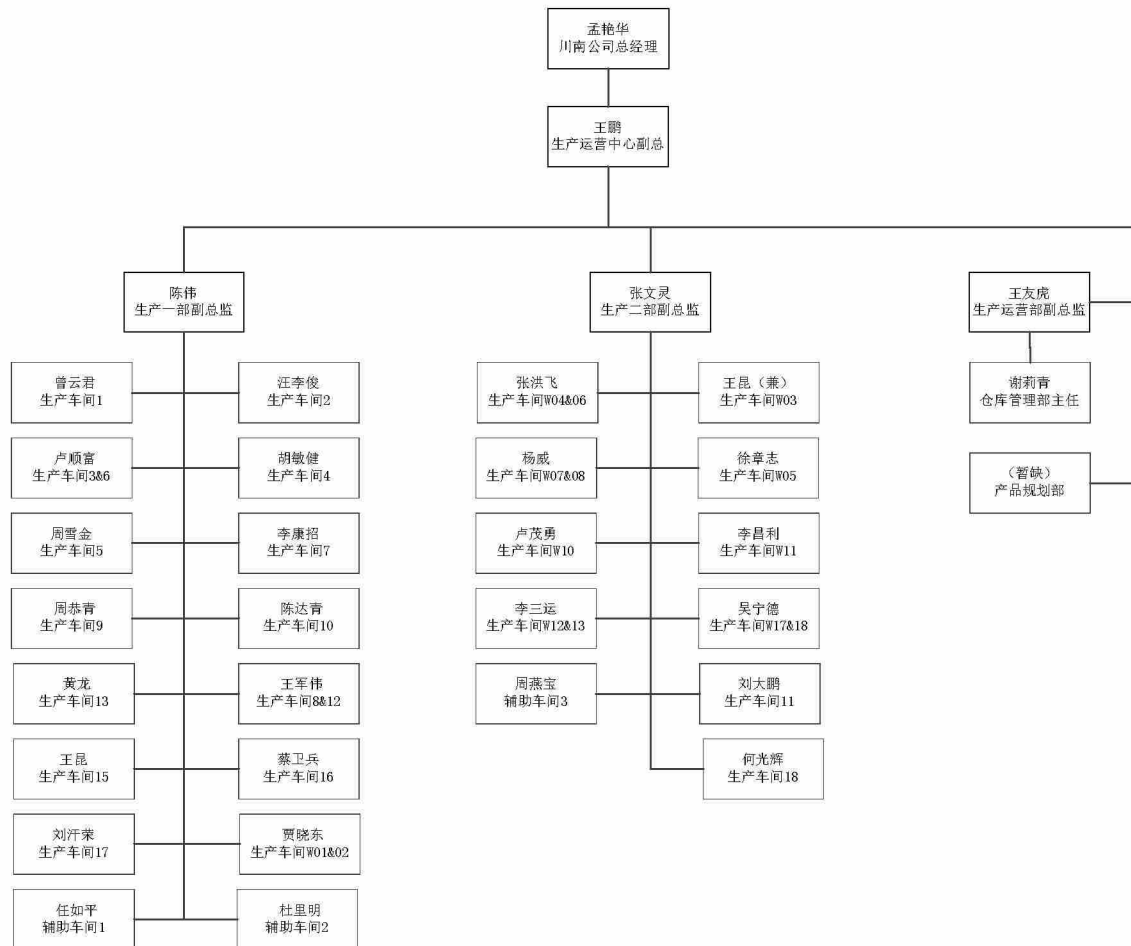
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October 22, 2019  
Page 4

Seth A. Goldberg

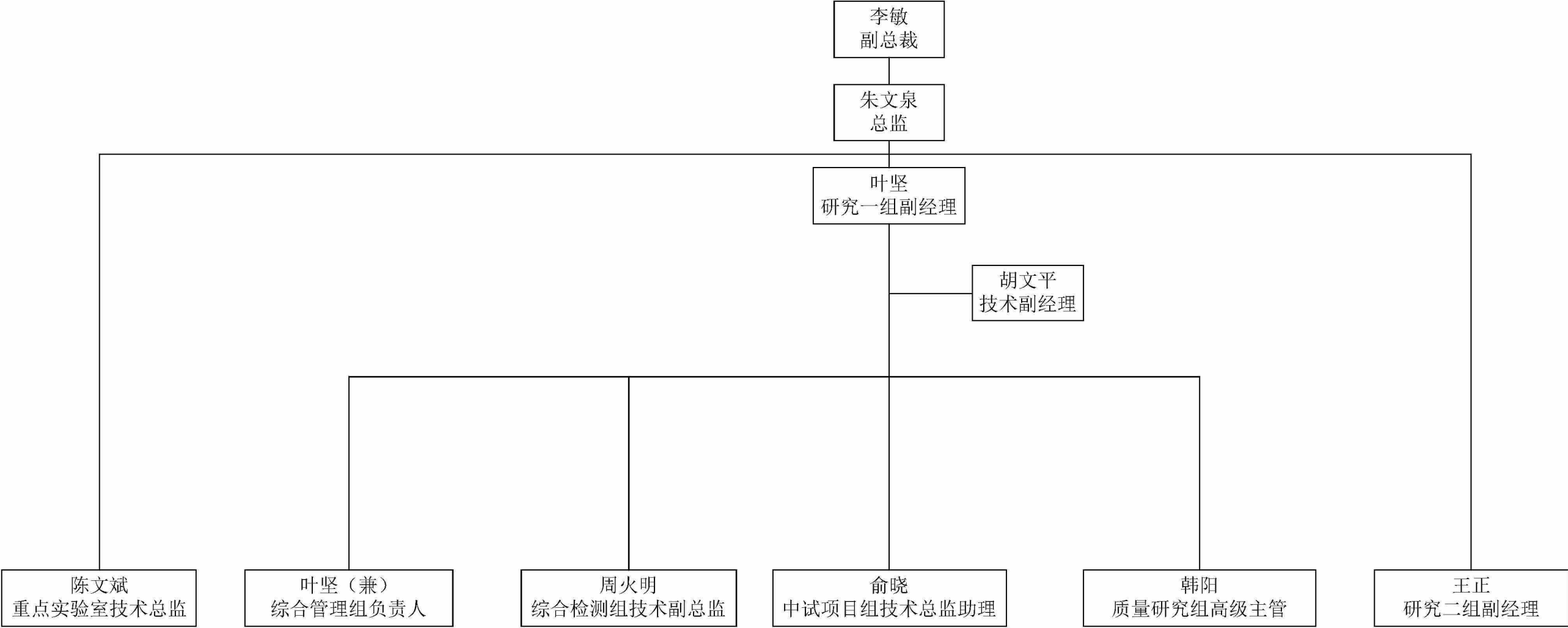
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# 浙江华海药业股份有限公司组织结构图

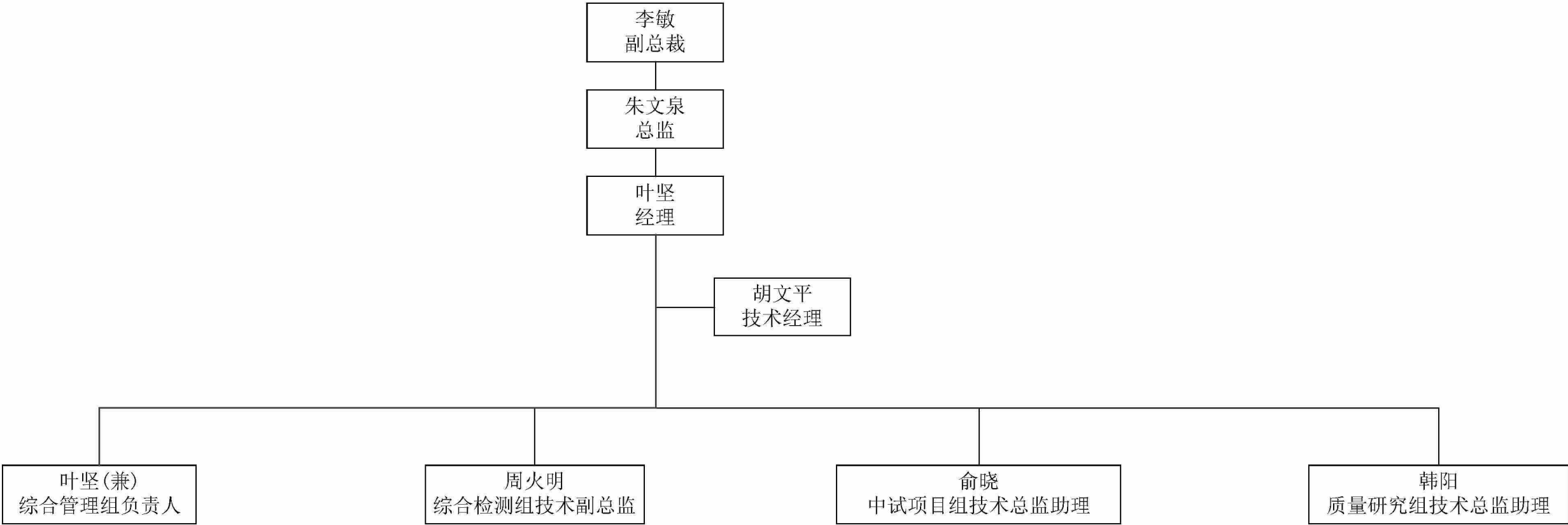
## 川南公司生产运营中心（2019年10月）



浙江华海药业股份有限公司组织结构图  
原料药质量研究部（2018年12月）

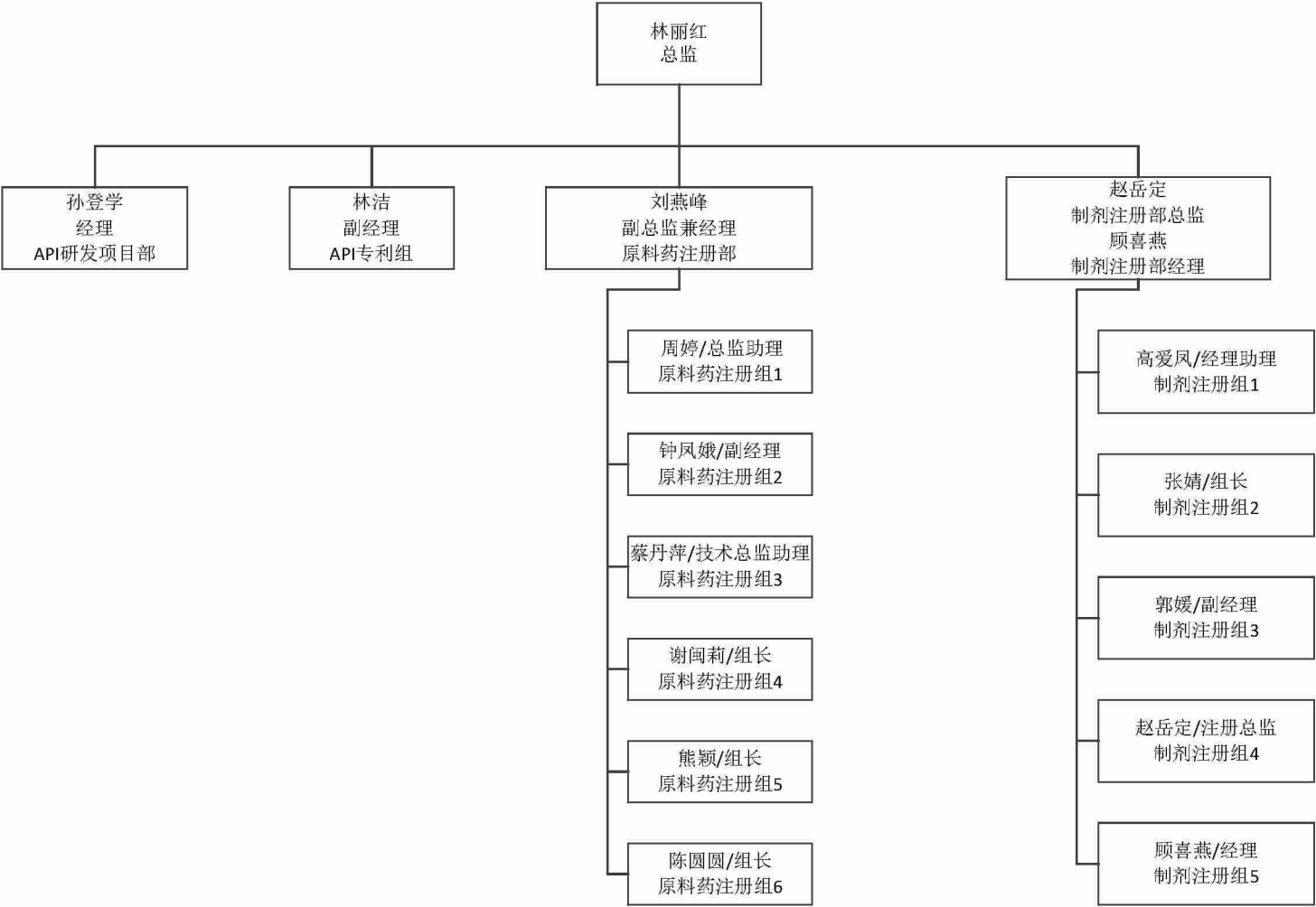


浙江华海药业股份有限公司组织结构图  
原料药质量研究部（2019年10月）



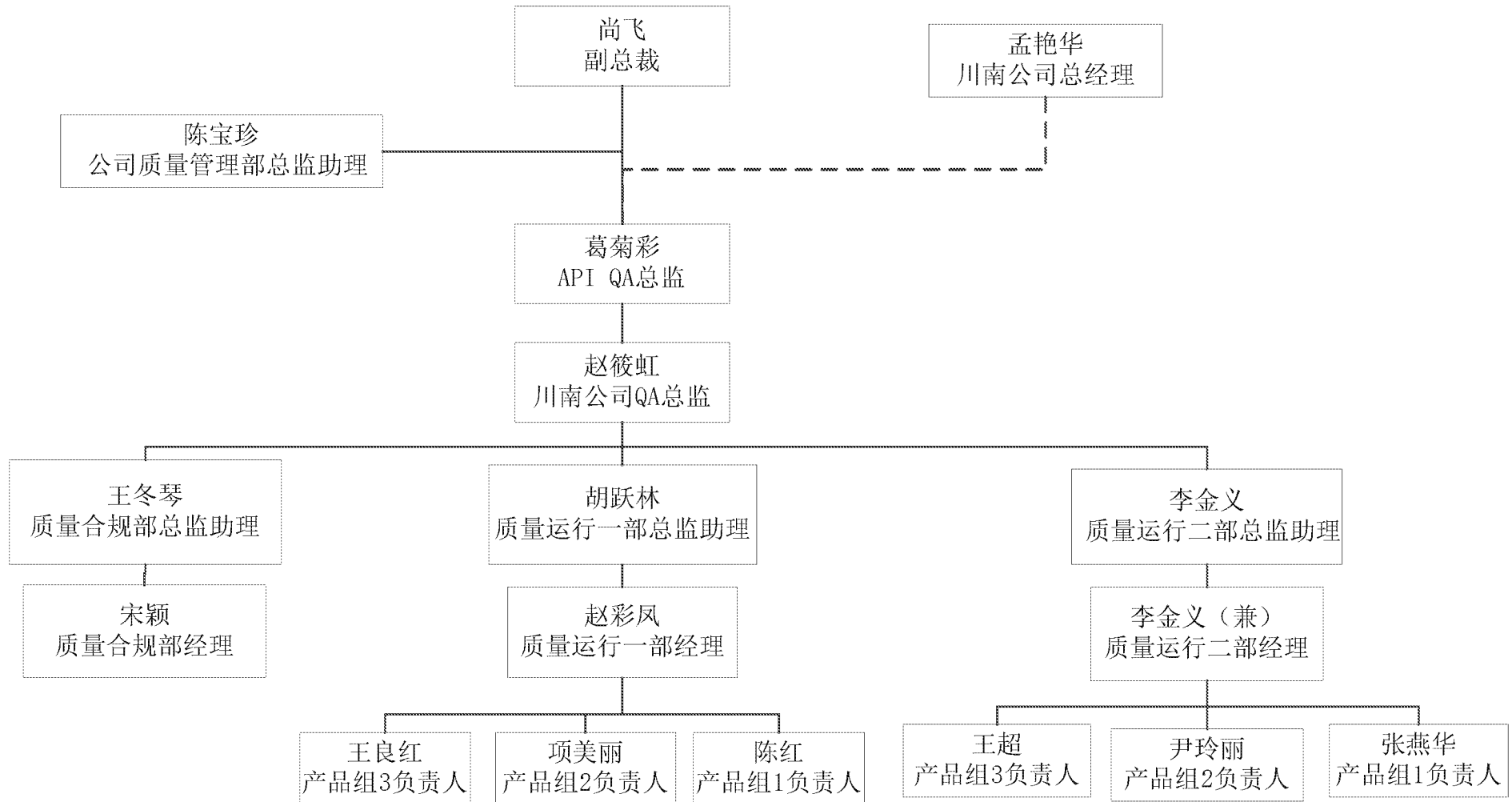


浙江华海药业股份有限公司组织结构图  
注册中心(2019年08月)



# 浙江华海药业股份有限公司组织结构图

## 川南公司质量管理中心（2019年10月）



# Company Structure

